

FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054

In the Matter of	)	
	)	
Application by Verizon New Jersey Inc.,	)	
Bell Atlantic Communications, Inc.	)	
(d/b/a Verizon Long Distance), NYNEX	)	
Long Distance Company (d/b/a Verizon	)	
Enterprise Solutions), Verizon Global	)	WC Docket No. 02-67
Networks Inc., and Verizon Select Services	)	
Inc., for Authorization To Provide	)	
In-Region, InterLATA Services	)	
in New Jersey	)	

**COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P.**

Sprint Communications Company L.P. opposes the above-captioned Supplemental Filing of Verizon for authorization to provide in-region, interLATA services in New Jersey.<sup>1</sup>

Verizon has refiled its application for 271 authorization in New Jersey after withdrawing its original filing on March 19, 2002. Its Supplemental Filing adopts its original filing in CC Docket No. 01-347 and the full record in that proceeding. *Id.* at 1. The public interest requires that the Supplemental Filing be denied for the reasons set forth in Sprint's Comments in CC Docket No. 01-347, filed January 14, 2002, which Sprint hereby incorporates by reference pursuant to the Commission's Public Notice in this docket released March 26, 2002 (DA 02-664).

---

<sup>1</sup> Supplemental Filing of Verizon New Jersey, WC Docket No. 02-67 (filed March 26, 2002) (Supplemental Filing).

Nothing in the Supplemental Filing shows that the local markets have been fully and irreversibly opened to competition. Verizon's statement that since its original filing "the number of residential lines served by competitors using facilities they have deployed themselves and using the UNE platform have each more than doubled"<sup>2</sup> is not supported by its data. Residential UNE Platform lines increased by 900 lines, or 112.5 percent, but facilities-based lines increased by only 100 lines, or 50 percent. Based on the Supplemental Declaration of John A. Torre,<sup>3</sup> the change in the number of facilities-based lines (which is redacted information) can be derived by subtracting UNE Platform lines and Resale lines from the Total number of lines as follows:

<u>Lines</u>	<u>October 2001</u>	<u>Jan./Feb. 2002</u>	<u>Change</u>
Facilities-Based	200	300	100
UNE Platform	800	1,700	900
Resale	56,000	55,000	-1,000
Total	57,000	57,000	0

Of the total residential lines identified by Verizon, all but 3.5 percent<sup>4</sup> are provided over resold facilities.

Verizon's data demonstrate that little has changed since its original application and that competitive residential service in New Jersey is sorely lacking. The 57,000 residential lines represent 1.3 percent of Verizon's residential loops in New Jersey as of

---

<sup>2</sup> Supplemental Filing at 4 (emphasis added).

<sup>3</sup> *Id.*, Supplemental Appendix A, Supplemental Declaration of John A Torre (Local Competition), Table 1.

<sup>4</sup>  $(300+1700)/57000 = .035$

December 31, 2000, while the 300 facilities-based lines represents 0.007 percent.<sup>5</sup>

Further, the provision of nearly all residential lines over resold facilities indicates that the competing carriers are unwilling to make a sizeable investment to serve the residential market in New Jersey.

Thus, competition for residential customers is nascent, and competition in forms other than resale is negligible. This negligible amount of facilities-based competition in the residential market falls far short of demonstrating that local residential competition has been fully and irreversibly enabled; and, until it is, the public interest is not satisfied by giving Verizon Section 271 authority.

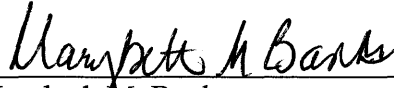
---

<sup>5</sup> In Trends in Telephone Service, Industry Analysis Division, Common Carrier Bureau, August 2001, Table 8.2, the number of "Bell Company Loops" for New Jersey (6,519,258) represents 96.6% of the "Total Loops" for New Jersey (6,749,679). In the FCC's Statistics of Communications Common Carriers, 2000/2001 Edition, Table 2.4, the number of "Residential Access Lines – Analog" was 4,497,326 as of December 31, 2000. Assuming that 96.6% of these lines were provided by Verizon, Verizon would have had approximately 4,344,417 residential lines.  $57,000/4,344,417 = 1.3\%$ , and  $300/4,344,417 = 0.007\%$ .

Because Verizon has failed to demonstrate that there is meaningful competition in New Jersey, its application for Section 271 relief should be denied.

Respectfully submitted,

Sprint Communications Company L.P.



Marybeth M. Banks  
H. Richard Juhnke  
401 9<sup>th</sup> Street, N.W., Suite 400  
Washington, D.C. 20004  
(202) 585-1908

April 8, 2002

### CERTIFICATE OF SERVICE

I, Sharon Kirby, do hereby certify that this 8th day of April 2002 copies of the Comments of Sprint Communications Company L.P. on the Supplemental Filing of Verizon for Section 271 Authorization to Provide In-Region, InterLATA Service in the State of New Jersey, WC Docket No. 02-67, will be delivered as indicated below to the following parties:

#### VIA E-MAIL AND HAND DELIVERY

Janice Myles\*  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
Room 5-B145  
445 12th Street, S.W.  
Washington, D.C. 20554

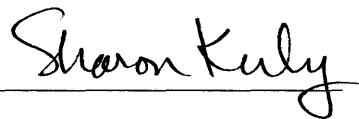
Qualex International\*\*  
Portals II  
Room CY-B402  
445 12th Street, S.W.  
Washington, D.C. 20554

US Department of Justice\*\*  
Antitrust Division, TTF  
Attn: David Arulanantham  
1401 H Street, NW, Suite 8000  
Washington, DC 20005  
[david.arulanantham@usdoj.gov](mailto:david.arulanantham@usdoj.gov)

#### U.S. FIRST CLASS MAIL

Michael E. Glover  
Karen Zacharia  
Leslie V. Owsley  
Donna M. Epps  
Joseph DiBella  
Verizon  
1515 North Court House Road  
Suite 500  
Arlington, Virginia 22201  
(703) 351-3860

Anthony Centrella  
Director, Division of Telecommunications  
New Jersey Board of Public Utilities  
Two Gateway Center, 8<sup>th</sup> Floor  
Newark, New Jersey 07102



Sharon Kirby

\* Twelve paper copies

\*\* One paper copy